

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
DELTA DIVISION**

**DEXTRIC WILLIAMS, INDIVIDUALLY AND
ON BEHALF OF THE HEIRS-AT-LAW/
WRONGFUL DEATH BENEFICIARIES OF
JERMAINE WILLIAMS, DECEASED**

PLAINTIFF

VS.

CIVIL ACTION NO.: 2:10-CV-215-SA-DAS

**CITY OF CLEVELAND, MISSISSIPPI; TASER
INTERNATIONAL, INC.; STANLEY PERRY,
INDIVIDUALLY AND IN HIS OFFICIAL CAPACITY;
AND BRYAN GOZA, INDIVIDUALLY AND IN HIS
OFFICIAL CAPACITY**

DEFENDANTS

**PLAINTIFF'S CONSOLIDATED SET OF EXHIBITS SUPPORTING
HIS RESPONSES TO DEFENDANTS' DAUBERT MOTIONS, MOTION
FOR QUALIFIED IMMUNITY, AND MOTIONS FOR SUMMARY JUDGMENT**

For the Court's convenience, Plaintiff hereby files this Consolidated Set of Exhibits in support of his responses to the following motions:

1. Defendant, Taser International, Inc.'s Motion to Exclude Plaintiff's Designated Expert, Glenda Glover;
2. Taser International, Inc.'s Motion to Exclude ECD-Related Opinions of Ernest Burwell;
3. Taser International, Inc.'s Motion to Exclude ECD-Related Medical Causation Opinions of Mark Seifert, M.D., and Motion to Strike Supplemental Expert Report;
4. Taser International, Inc.'s Motion to Exclude ECD-Related Medical Causation Opinions of Deputy Coroner and Medical Examiner;
5. Taser International, Inc.'s Motion for Summary Judgment re Product Liability and Causation;
6. Officer Stanley Perry and Officer Bryan Goza's Motion for Qualified Immunity; and
7. The City of Cleveland, Mississippi, Officer Stanley Perry and Officer Bryan Goza's Motion for Summary Judgment.

Ex.	Description
A.	Deposition of Officer Perry
B.	Deposition of Officer Goza
C.	Deposition of Officer Weeks
D.	Statement of Officer Perry
E.	Statement of Officer Goza
F.	Statement of Officer Mengarelli
G.	Statement of Officer Weeks
H.	Taser Sign Out Sheet
I.	Pafford EMS Medical Records
J.	Bolivar Medical Center Medical Records
K.	Taser Data Download
L.	Plaintiff's Initial Disclosures
M.	<i>Taser Discharges Capture Cardiac Rhythm in a Swine Model</i> , Acad. Emerg. Med., 14:S104 (2007) Daniel Valentino, et al.
N.	<i>Human Cardiovascular Effects of a New Generation Conducted Electrical Weapon</i> , Forensic Science International 204 (2011), Jeffrey D. Ho, M.D., et al.
O.	Amnesty International Publication, " <i>Less Than Lethal</i> "? <i>The Use of Stun Weapons in US Law Enforcement</i>
P.	Taser September 30, 2009 Product Warnings
Q.	Taser Training Bulletin, 15.0, Dated October 15, 2009
R.	Taser Training Slide #29, <i>Effective Target Zones</i>
S.	Taser Probe Spread Training Video
T.	Training Slide #277
U.	Deposition of Patrick Waller Smith
V.	Report of the Maryland Attorney General's, <i>Task Force on Electronic Weapons</i>
W.	<i>Funding Source and Author Affiliation in Taser Research are Strongly Associated with a Conclusion of Device Safety</i> , American Heart Journal, September 2011, Peyman N. Azadani, et al.
X.	Curriculum Vitae of Mark J. Seifert, M.D.
Y.	<i>Ventricular Fibrillation in a Man Shot with a Taser</i> , Emergency Medicine Journal, Emergency Casebook, Vol. 27, No. 8 (2010), Roseanne S. Naunheim, M.D., et al.
Z.	<i>Evaluation of the Skin-to-Heart Distance in the Standing Adult by Two-Dimensional Echocardiography</i> , Journal of the American Society of Echocardiography, Vol. 21, No. 6, (2008), Peter S. Rahko, M.D.
AA.	<i>Taser X26 Discharges in Swine Produce Potentially Fatal Ventricular Arrhythmias</i> , Academic Emergency Medicine, Vol. 15, No. 1 (2008) Robert J. Walter, PhD., et al.
BB.	Report of Medical Expert Opinion of Mark J. Seifert, M.D., FACC, MHRS

CC.	Supplemental Report of Medical Expert Opinion of Mark J. Seifert, M.D., FACC, MHRS
DD.	Autopsy – Determination of Amy Gruszecki, D.O. Pathologist
EE.	60 Minutes Video
FF.	Report of Dennis Waller
GG.	Deposition of Dennis K. Waller
HH.	Report of Ernest Burwell
II.	Deposition of Ernest Burwell
JJ.	Cleveland Police Department Law Enforcement Policies and Procedures
KK.	Composite Exhibit of CPD Arrest & Incident Reports involving Taser Electronic Weapon Applications ¹
LL.	Deposition of Glenda B. Glover
MM.	Deposition of Amy C. Gruszecki, MSFS, D.O.
NN.	Deposition of Dr. J.O. Trice, M.D.
OO.	Deposition of Mark J. Seifert, M.D.
PP.	Curriculum Vitae of Glenda B. Glover, PhD., J.D., CPA
QQ.	Affidavit of Ernest Burwell

Respectfully submitted this the 24th day of January, 2012.

/s/ Ronald E. Stutzman, Jr.
Ronald E. Stutzman, Jr.

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¹ Exhibit "KK" contains information regarding other incidents in which officers of the Cleveland Police Department used Taser weapons on citizens of the City of Cleveland. The City of Cleveland marked these documents as confidential pursuant to the terms of the Protective Order entered into in this matter. Accordingly, Plaintiff has filed Exhibit "KK" under seal with the Clerk of Court pursuant to Local Rule 79.

CERTIFICATE OF SERVICE

I, Ronald E. Stutzman, Jr., do hereby certify that I have this day filed the foregoing pleading with the Clerk of Court via the Court's ECF System which sent notification of such filing to all counsel of record.

SO CERTIFIED, this the 24th day of January, 2012.

/s/ Ronald E. Stutzman, Jr.
Ronald E. Stutzman, Jr.